

**UNITED STATES OF AMERICA  
IN THE DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ERNEST FLAGG, as Next Friend of  
JONATHAN BOND, a minor,

Plaintiff,

Case No.: 05-CV-74253  
Hon. Gerald Rosen

-VS-

CITY OF DETROIT, a municipal corporation;  
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;  
DEPUTY DETROIT POLICE CHIEF CARA BEST;  
JOHN DOE POLICE OFFICERS 1 - 20;  
ASST. DEPUTY POLICE CHIEF HAROLD CURETON;  
COMMANDER CRAIG SCHWARTZ;  
POLICE LT. BILLY JACKSON;  
MAYOR KWAME M. KILPATRICK,  
CHRISTINE BEATTY, jointly and severally

**Ex Parte Motion for  
Enlargement of Page  
Limit Pursuant to  
LR 7.1(c)(3)(A)**

Defendants.

**Norman Yatooma & Associates, P.C.**  
By: Norman A. Yatooma (P54746)  
By: Robert S. Zawideh (P43787)  
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**City of Detroit Law Department**  
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**City of Detroit Law Department**  
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Co-Counsel for Defendants City of Detroit,  
Mayor Kwame M. Kilpatrick, Detroit  
Police Chief Ella Bully-Cummings,  
Commander Craig Schwartz and Christine  
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**EX-PARTE MOTION FOR ENLARGEMENT OF PAGE  
LIMIT PURSUANT TO LR 7.1(c)(3)(A)**

PLAINTIFF ERNEST FLAGG, as Next Friend of JONATHAN BOND, a minor, by his undersigned counsel, NORMAN YATOOMA & ASSOCIATES, P.C., for their Ex Parte Motion for Enlargement of Page Limit pursuant to LR 7.1(c)(3)(A) states as follows:

1. In order to adequately address the legal issues raised in Defendants' Motion to Dismiss and to provide the Court with the proper factual background necessary to consideration of the Motion, Plaintiff is unable to limit its Response Brief to twenty (20) pages as required by L.R. 7.1(c)(3)(A).

WHEREFORE, PLAINTIFF ERNEST FLAGG respectfully requests that the Court enter an order granting its motion and providing for an enlargement of its Response Brief in Opposition to the Motion to Dismiss not to exceed a total of twenty-five (25) pages.

Respectfully Submitted,

Dated: February 28, 2008

/s/ Robert S. Zawideh  
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**BRIEF IN SUPPORT OF EX-PARTE MOTION FOR  
ENLARGEMENT OF PAGE LIMIT PURSUANT TO LR 7.1(c)(3)(A)**

For the reasons stated in the accompanying Motion, Plaintiff ERNEST FLAGG, by and through its undersigned counsel, respectfully requests this Court enter an Order granting an enlargement of its Response Brief in Opposition to Motion to Dismiss not to exceed a total of twenty-five (25) pages.

Respectfully Submitted,

Dated: February 28, 2008

/s/ **Robert S. Zawideh**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 29, 2008 I electronically filed the foregoing papers with the Clerk of the Court using the CM/ECF system:

EX-PARTE MOTION FOR ENLARGEMENT OF PAGE LIMIT PURSUANT TO LR 7.1(c)(3)(A)

On the following:

**Morganroth & Morganroth, PLLC**  
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Mayor Kwame M. Kilpatrick, Detroit Police  
Chief Ella Bully-Cummings, Commander

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Mayor Kwame M. Kilpatrick, Detroit Police  
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February 29, 2008

/s/ Robert S. Zawideh

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